# Initial and Compliance Status Notification

**Area Source Rule for Nine Metal Fabrication and Finishing Source Categories**
40 CFR Part 63 Subpart XXXXXX

This form must be submitted no later than 120 days after initial start-up of your facility.

*If you are an existing source and did not submit an Initial Notification or a Compliance Status Notification, you are still required to submit this form.*

☐ **Yes I am subject to 40 CFR 63 Subpart XXXXXX (6X). Check the box.**

The operations at my facility are affected sources subject to Subpart 6X because materials used in processing contain, or have the potential to emit, at least one of the following Hazardous Air Pollutants (HAPs) in the specified amounts:

0.1 percent or more by weight of compounds or elemental forms of cadmium, chromium, or nickel;

0.1 percent or more by weight of compounds of lead; and/or,

1.0 percent or more by weight of compounds or elemental forms of manganese.

1. Owner's name/title: _____
2. Company name: _____
3. Owner's company address: _____
4. Owner's telephone number: _____
5. Owner's email address (if available): _____
6. Is the operator the same person as the owner? Yes ☐ No ☐ (if no, please provide the following information for the operator.
7. Operator's name/title: _____
8. Operator's address: _____
9. Operator's telephone number: _____
10. Operator's email address (if available): _____
11. Facility address (physical location): _____
12. Describe the type(s) of operation(s) that occur at your facility from the nine source categories in Subpart 6X and list the associated North American Industry Classification System (NAICS) code(s) for each operation:

_____

_____

_____

_____

13. How many workers do you typically employ? _____
14. Table 1 on the next page lists the five industrial processes that are subject to Subpart 6X and the associated standards that are required for compliance. Identify all the processes that occur at your facility by checking the boxes and include the number of units for each. In addition, check the appropriate boxes to verify that you are in compliance with the requirements for each of your processes.

## Table 1. Processes subject to Subpart 6X

| Type of Process | Check all that apply | Number of units |
|---|---|---|
| **Dry abrasive blasting** | ☐ | |
| **(1) Totally enclosed and unvented blast chambers - no control device** | ☐ | |
| **Check the boxes below acknowledging your compliance with the requirements:**<br>a. ☐ Dust generation is minimized during the emptying of blasting enclosures to reduce HAP emissions.<br>b. ☐ All equipment associated with blasting operations is operated according to manufacturer's instructions. | | |
| **(2) Vented enclosures - with control device** | ☐ | |
| **Check the boxes below acknowledging your compliance with the requirements:**<br>a. ☐ Emissions are captured and vented to a filtration control device.<br>b. ☐ All equipment associated with blasting operations, including the filtration control device, is operated according to manufacturer's instructions.<br>c. ☐ A record is maintained of the manufacturer's specifications for the filtration control devices.<br>d. ☐ Excess dust is minimized in the surrounding area to reduce HAP emissions, as practicable.<br>e. ☐ Enclosures are in place for dusty abrasive material storage areas and holding bins. Chutes and conveyors that transport abrasive material are sealed. | | |
| **(3) Abrasive blasting of objects over 8 feet in any dimension - no control device** | ☐ | |
| **Check the boxes below acknowledging your compliance with the requirements:**<br>a. ☐ Excess dust is minimized in the surrounding area to reduce HAP emissions, as practicable.<br>b. ☐ Enclosures are in place for dusty abrasive material storage areas and holding bins. Chutes and conveyors that transport abrasive material are sealed.<br>c. ☐ All equipment associated with blasting operations is operated according to manufacturer's instructions.<br>d. ☐ Dry abrasive blasting media is <u>not</u> re-used unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size.<br>e. ☐ Switching from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide) is done whenever practicable.<br>f. ☐ <u>Abrasive blasting outdoors</u>. Visual determinations of fugitive emissions (using Method 22) are performed at the fence line or property border nearest to the blasting operation.<br>g. ☐ <u>Abrasive blasting indoors.</u> Visual determinations of fugitive emissions (using Method 22) are performed at the primary vent, stack, exit or opening from the building containing the blasting operations.<br>h. ☐ All visual determinations (using Method 22) are completed according to the schedule specified in 63.11517(b). Records of results and any corrective actions taken are kept as specified in 63.11519(c)(2).<br>i. ☐ If visible emissions are detected (using Method 22), corrective actions are implemented until the emissions are eliminated; then the following actions are completed:<br>1. ☐ A follow-up inspection for visible emissions is performed and the results are recorded.<br>2. ☐ Records of all instances where visible emissions are detected, any corrective actions taken, and results of follow-up inspections, are kept as specified in 63.11519(b)(5). This information is reported in my annual certification and compliance report submittal. | | |

| Type of Process | Check all that apply | Number of units |
|---|---|---|
| **Dry machining** | ☐ | |

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ Excess dust is minimized in the surrounding area to reduce HAP emissions, as practicable.

b. ☐ All equipment associated with machining is operated according to the manufacturer's instructions.

| Type of Process | Check all that apply | Number of units |
|---|---|---|
| **Dry grinding and dry polishing with fixed or stationary machines - with control device** | ☐ | |

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ Emissions are captured and vented to a filtration control device.

b. ☐ A record is maintained of the manufacturer's specifications for the filtration control devices.

c. ☐ Excess dust is minimized in the surrounding area to reduce HAP emissions, as practicable.

d. ☐ All equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, is operated according to manufacturer's instructions.

| Type of Process | Check all that apply | Number of units |
|---|---|---|
| **Spray painting** | ☐ | |
| **(1) In a spray booth** | ☐ | |
| **(2) In a spray room** | ☐ | |

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ Spray booth(s) and/or room(s) have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered.

b. ☐ Spray booth(s) and/or room(s) are ventilated so that air is drawn into the booth/room and leaves only through the filter.

c. ☐ Spray booth(s) and/or room(s) are fitted with a filter that achieves at least 98% capture efficiency.

d. ☐ Regular inspections and filter replacements are conducted in all spray booth(s) and/or room(s) according to manufacturer's instructions. Records are kept of these activities.

e. ☐ Alternative to a. through d. above: Spray booth(s) and/or room(s) are equipped with a water curtain, are maintained and operated according to the manufacturer's specifications, and achieves at least 98% control.

**(3) Without a spray booth or spray room (check all that apply):**

a. ☐ Objects larger than 15 feet

b. ☐ Objects at Fabricated Structural Metal Manufacturing Facilities (e.g., bridges, buildings, boats).

| Standards for spray painting application equipment | Check all that apply | Number of units |
|---|---|---|
| **(4) Use of High-Volume Low-Pressure (HVLP) spray guns or other high transfer efficiency spray paint delivery system** | ☐ | |

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ Documentation is maintained for the manufacturer's specifications and any operating instructions for the HVLP or other high transfer efficiency spray paint delivery systems.

b. ☐ Spray gun cleaning is done with either non-HAP solvents or by a method that does not create an atomized mist of spray from cleaning solvent and paint residue outside of a container that collects the used gun cleaning solvent. Non-atomizing methods may also be used per 63.11516(d)(4).

| (5) Training program for painters | ☐ | |
|---|---|---|

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ All new and existing personnel, including contract personnel, who spray apply paint are trained in the proper spray application of paints and proper setup and maintenance of spray equipment.

b. ☐ The facility maintains a list of all current personnel by name and job description who are required to be trained.

c. ☐ Hands-on or in-house or external classroom instruction addresses, at a minimum, initial and refresher training in the following topics:

1. Spray gun equipment selection, set up and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
2. Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
3. Routine spray booth and filter maintenance, including filter selection and installation.
4. Environmental compliance with requirements of Subpart 6X.

d. ☐ A description of the painting methods to be used at the completion of initial or refresher training is developed to demonstrate, document, and provide certification of successful completion of the required training.

e. ☐ Alternative to initial training: Documentation or certification is maintained for those painter's whose work experience and/or training has resulted in training equivalent to the list in (5) c. above.

| (6) Records of training certification. | ☐ | |
|---|---|---|

**Check the box below acknowledging your compliance with the requirements:**

a. ☐ Completion dates for initial training and the most recent refresher training (required every 5 years) are included in the certification records

| Type of Process | Check all that apply | Number of units |
|---|---|---|
| **Welding** | ☐ | |

**(1) All welding operations that use HAP-containing welding rod, welding wire, or other materials.**

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ All equipment, capture, and control devices associated with welding operations are operated according to manufacturer's instructions.

b. ☐ A record is maintained of the manufacturer's specifications for the capture and control devices

c. One or more of the following management practices is being implemented at my facility to minimize HAP emissions, as practicable, while maintaining the required welding quality through the application of sound engineering practices.

☐ Welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW), which is also called metal inert gas welding (MIG)).

☐ Welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates.

☐ Welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation.

☐ Welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) that are optimized to reduce the amount of welding fume generated.

☐ Welding fume capture and control system operated according to the manufacturer's specifications.

**(2) Additional requirements for welding operations that use 2,000 pounds or more of HAP-containing welding rod or welding wire annually (calculated on rolling 12-month basis).**

**Check the boxes below acknowledging your compliance with the requirements:**

a. ☐ Tier 1 monitoring (see 63.11516(f)(3)): Visual determinations of fugitive emissions (using Method 22) are performed at the primary vent, stack, exit, or opening from the building containing the welding operations. The frequency of monitoring is done according to the schedule specified in 63.11517(b). Records are kept for all visual determination results and any corrective actions taken.

b. ☐ If visible emissions are detected, the following requirements will be completed (see 63.11516(f)(4)):

1. Corrective actions are performed and include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures that were selected in (1) c. above.
2. Following completion of any corrective actions, a follow–up inspection is performed for visible emissions (using Method 22) at the primary vent, stack, exit, or opening from the building.
3. Records are kept of all instances where visible emissions are detected, any corrective action taken, and the results of the follow-up inspections for visible emissions. This information is reported in my annual certification and compliance report submittal.

c. ☐ Tier 2 monitoring (see 63.11516(f)(5)): If visible fugitive emissions are detected (using Method 22) more than once during any consecutive 12 month period, the following requirements will be completed:

1. Within 24 hours of detecting visible fugitive emissions, visual determinations of emissions opacity (using Method 9) are performed at the primary vent, stack, exit, or opening from the building. The frequency of monitoring is done according to the schedule specified in 63.11517(d).
2. Records are kept for opacity results and any corrective actions taken. This information is reported in my annual certification and compliance report submittal.

d. ☐ If opacity is less than or equal to 20% but greater than zero based on the average of the 6-minute average opacities (using Method 9), corrective actions are performed, including inspection of all welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures that were selected in (1) c. above.

e. ☐ Tier 3 monitoring (see 63.11516(f)(7)): If opacity exceeds 20% based on the average of the 6-minute average opacities (using Method 9), the following requirements will be completed:

1. An exceedance report is prepared as detailed in 63.11519(b)(8), and submitted along with my annual certification and compliance report.
2. Within 30 days of the opacity exceedance, a Site-Specific Welding Emissions Management Plan (Welding Plan) that contains the information detailed in 63.11516(f)(8) is prepared and implemented. If a Welding Plan has already been prepared per 63.11516(f)(8), then a revised plan is prepared and implemented within 30 days of the exceedance.
3. While developing or revising the plan, visual determinations of emissions opacity (using Method 9) at the primary vent, stack, exit, or opening from the building are continued to be performed. The frequency of monitoring is done according to the schedule specified in 63.11517(d).
4. Records are kept of opacity results. This information is reported in my annual certification and compliance report submittal.

## Certification:

**Check the following box and sign below:**

☐ I am an affected source that is submitting this form as both the Initial Notification and the Notification of Compliance Status. I am in compliance with all the relevant standards and other requirements of 40 CFR Part 63 Subpart XXXXXX.

**I hereby certify the truth, accuracy, and completeness of this notification.**

| Signature of Responsible Official | Date |
|---|---|
| Print Name of Responsible Official and Title | Telephone number |
| E-Mail Address | |

## Submittals:

1. To the New Mexico Air Quality Bureau, Compliance Reporting Section, 525 Camino de los Marquez, Suite 1, Santa Fe, NM 87505-1816; **and**

2. To EPA Region VI, Director, Air Pesticides and Toxics, 1445 Ross Avenue, Dallas, TX 75202-2733; **and**

3. Keep a copy for your records.

**Note: An Annual Certification and Compliance Report must be prepared and submitted (postmarked) no later than January 31st of each year. For details on the information that is required in the annual reports, please see 63.11519(b): *What reports must I prepare or submit?***